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April 8, 2005

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO) Groundwater Operable Unit
Monthly Report; March 1 - March 31, 2005 Reporting Period

Dear Nabil:

Attached is the Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports. This report is for the period March 1 – March 31, 2005.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Ken Bardo, - U. S. EPA
Mayor Sauget - Sauget, IL
Sandra Bron – IEPA
Mike Coffey - USFWS
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor Frank Bergman – Cahokia
L. Glen Kurowski - Monsanto
Cathleen Bumb – Solutia
Linda Tape - Husch & Eppenberger
Richard Williams – Solutia

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Status Report

Date of Report: April 8, 2005
Period Covered: March 1 - March 31, 2005

Agency Actions / Communications

In an e-mail message dated June 19, 2003, U. S. EPA requested the submission of revised versions of the Focused Feasibility Study, the Remedial Design Work Plan, and the Pre-Final (95%) Remedial Design. The revisions were required to allow the use of a slurry wall rather than jet grouting for construction of the barrier wall. The revised documents were submitted on July 3, 2003. The ESD was issued by US EPA on July 30, 2003. The Final Design Submittals were approved by EPA on October 16, 2003.

Work Performed During the Reporting Period

Slurry Wall

- A sampling and analysis plan for the additional analysis of the spoil materials was submitted to the Agencies on February 25th. Review comments with suggested revisions to the characterization program were received from the U. S. EPA oversight contractor, CH2M Hill, on February 28th and the revisions were accepted and incorporated into the proposed sampling and analysis plan during a teleconference the following day (March 1st). Samples were obtained on March 7th and the results were submitted to the Agency on March 18th. Based on those results, the Agency gave approval to move approximately 4,000 cu. yd. of the spoil to the temporary stockpile on March 22nd. This material is required to complete the grading of the stockpile. Approval to leave the rest of the spoil in its present location along the slurry wall alignment was given on March 25th. Approximately 3,000 cu. yd. of spoil were moved to the stockpile by the end of March.

Groundwater Treatment

- For the first half of the month, the system was operated to comply with the ROD requirement that the inside piezometric level at each piezometer pair be kept equal to, or less than, the level in the corresponding outside member of the pair. However, because of the low river levels, the water level in the inside member of piezometer pair PZ -2 exceeded the water level in the outside member for some part of this time.
- The system was effectively taken out of service on March 14th to install sampling ports for the sand content testing requested by the Agency. The Work Plan for that testing was submitted to the Agency on January 24th and was approved on February 23rd. During the installation of these ports, which was completed on March 16th, only two of the three wells were operating at any given time. The third well was shut down while the port was being installed. Once the sampling ports were installed on March 16th, the entire system was shut down during the day while the testing equipment was fitted to the wells and checked. The system was run in its normal mode at night.
- Sand content and step drawdown testing began on well EW-1 on March 21st and was completed on March 26th. The system was shut down until March 28th to allow the aquifer to equilibrate and testing then began on well EW-3 on March 28th.
- In an e-mail dated March 24th, the U.S. EPA confirmed an earlier decision that the first groundwater, sediment, and surface water performance sampling event would occur during the second quarter of 2005.
- Since the system was shut off for at least half of the month of March, the normal logging of daily average data for the system was discontinued until the well testing is complete. Consequently, no water level and pumping data are attached. (Note: extensive groundwater data was generated during the pumping tests and submitted directly to the EPA and their contractors.)

Schedule

It is currently estimated that the project will be completed by the end of June, assuming no significant weather or material delays.

Submittals During Reporting Period

There were no submittals (other than the pump test data) to the Agency during the reporting period.

Work Scheduled for Next Reporting Period

- Complete sand content and step drawdown testing on EW-3 and EW-1.
- Once testing is complete, continue pumping and treating groundwater based on piezometric levels. Flow rates will be controlled such that the water level in each of the piezometers inside the barrier wall is less than, or equal to, the water level in the corresponding piezometer outside the wall.
- Prepare and submit a report on the results of the 90 day trial pumping period, with recommendations for any changes to the ROD criteria that might be appropriate.
- Continue site restoration.
- Award contract for the installation of the cover over the temporary spoil stockpile..